

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

SURVEYORS' PARK, et al.,

Plaintiffs,

v.

SANDY G. ROBINSON, et al.,

Defendants.

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DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

Civil Action Number ~~148-MHT~~
Jury Trial Requested

2: 06CV148-MHT

Plaintiffs Response to Defendants Clark and Chandler's Amended Motion For
Defendants' First Request For Admission To Be Deemed Admitted

Plaintiffs issue the following response.

1. Defendants have not put forth any reason for which the Plaintiffs would find reason to further amend or change. A responsive answer can not change but a responsive answer may be amended only after an adversarial party point out the need to clarify or rephrase the responsive answer.
2. Defendants did find the misnomer in the certificate of service document. The misnomer certainly holds to the month of September. The law clerks of the plaintiffs are certainly competitive at this stage of this litigation.
3. The mere fact that Defendants have read or analyzed the response of the plaintiffs renders their procedural assertion a moot issue for the court.
4. The Defendants complaints about the response(s) of the plaintiffs are without authority. The reaction of the defendants are not supported by reasoning and do not give the plaintiffs notice of just what they seem to be dissatisfied with

or want plaintiffs to clarify, change or add to the responsive answers of the plaintiffs.

5. The defendants do not cite with specificity what they define as *completely unresponsive* admission.
6. Plaintiffs have not failed to participate in the discovery process.

Wherefore, the plaintiffs move the court to render an order in favor of the plaintiffs regarding this matter.

Respectfully submitted,



SURVEYORS PARK

By: PAUL POGUE

301 Kahn Street, the Mays Building, Montgomery, Alabama 36104

Certificate of Service

I hereby certify that on the 2nd day of November, 2006, a copy of the foregoing has been mailed to Mr. Charles T. Conway, P.O. Box 302550, Montgomery, Alabama 36130.

